

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 12-md-2323 (AB)
<b>THIS DOCUMENT RELATES TO:</b>	MDL No. 2323
<b>ALL ACTIONS</b>	Hon. Anita B. Brody

**CO-LEAD CLASS COUNSEL'S MOTION TO STRIKE THE BARBER OBJECTORS'  
LATE-FILED NOTICE OF INTENT TO APPEAR AND TO PRECLUDE THEIR  
COUNSEL FROM APPEARING AT THE FAIRNESS HEARING**

Co-Lead Class Counsel move to strike the late-filed notice of intent to appear at the November 19, 2014, Fairness Hearing filed by objectors Michael Barber, et al. (the "Barber objectors")<sup>1</sup> [ECF No. 6370], and to preclude their counsel from appearing at the Fairness Hearing. As set forth in the accompanying memorandum of law in support of this motion, the Barber objectors' notice should be stricken because it was not timely filed and the Barber objectors' counsel should therefore be precluded from presenting argument at the Fairness Hearing.

Dated: November 7, 2014

Respectfully submitted,

/s/ Christopher A. Seeger  
Christopher A. Seeger  
SEEGER WEISS LLP  
77 Water Street

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<sup>1</sup> The Notice of Intent to Appear at Fairness Hearing, ECF No. 6370, was filed on behalf of objectors Michael Barber, Myron Bell, Jeff Blake, Larry Bowie, Ben T. Coates, Daunte Culpepper, Edgerton Hartwell II, Johnny McWilliams, Adrian Murrell, Marques Murrell, Derek Ross, Benjamin Rudolph, Anthony Smith, Fernando Smith, and Anthony ("Tony") Smith.

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**Co-Lead Class Counsel**

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of Co-Lead Class Counsel's Motion to Strike the Barber Objectors' Late-Filed Notice of Intent to Appear and to Preclude Their Counsel From Appearing at the Fairness Hearing was served electronically via the Court's electronic filing system on the 7<sup>th</sup> day of November, 2014, upon all counsel of record.

Dated: November 7, 2014

/s/ Christopher A. Seeger

Christopher A. Seeger